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February 11, 2021

BY ECF & EMAIL

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. William Robles*
16 Cr. 387 (JMF)

Dear Judge Furman:

I write on behalf of William Robles, currently incarcerated at FMC Devens, Massachusetts. I represented Mr. Robles in the above-referenced matter pursuant to Criminal Justice Act 18 U.S.C. §3006A, during his 2020 request for compassionate release. I filed the motion on June 30, 2020, requesting compassionate release for Mr. Robles. That motion was denied on July 17, 2020.

I respectfully request CJA reappointment to submit a motion requesting reconsideration of the Court's denial of our request for compassionate release, as well as a motion requesting, in the alternative, a reduction to Mr. Garcia's sentence pursuant to *United States v. Brooker*, No. 19-3218, WL 5739712 (2d Cir. Sept. 25, 2020). Should the Court grant this request, I would ask that reappointment be ordered *nunc pro tunc* from January 1, 2021, as I have been in contact with Mr. Robles since the beginning of this year monitoring his medical situation and his conditions of confinement at FMC Devens.

Thank you for your consideration of this request.

Respectfully Submitted,

Ken Womble

Ken Womble
Zeman & Womble, LLP

Cc: AUSA Jordan Estes

Application GRANTED. The Clerk of Court is
directed to terminate Doc. #486. SO ORDERED.



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